DoD VPP CX

Development, Validation, Implementation and Enhancement of a Voluntary Protection Programs Center of Excellence (VPP CX) Capability for Department of Defense (DoD)

Occupational Safety and Health Administration (OSHA) Recordkeeping and North American Industry Classification System (NAICS) Determination

DoD Lead Agent:
Office of the Assistant Secretary of the Army (Installations and Environment)

Department of Defense Voluntary Protection Programs Center of Excellence

Operated by:
CTC Concurrent Technologies Corporation

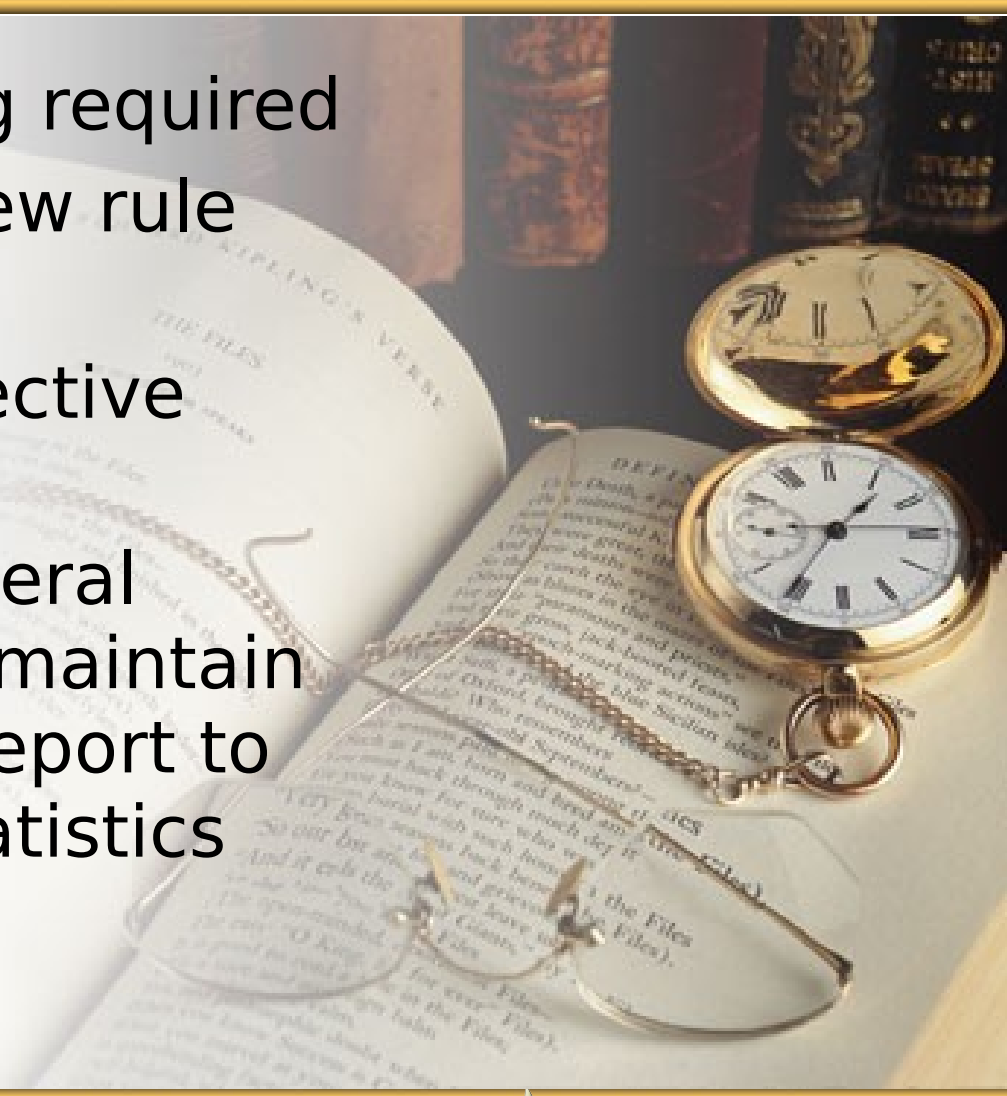
Objectives

After this training you will be able to:

- Explain the history of OSHA recordkeeping
- Identify recordkeeping goals
- Identify recordable and non-recordable incidents
- Define the role of Leadership in recordkeeping
- Identify requirements for NAICS code determination
- Compare Total Case Incident Rate (TCIR) and Days Away, Restricted, and Transferred (DART) case rate
- Define the role of Leadership in NAICS.

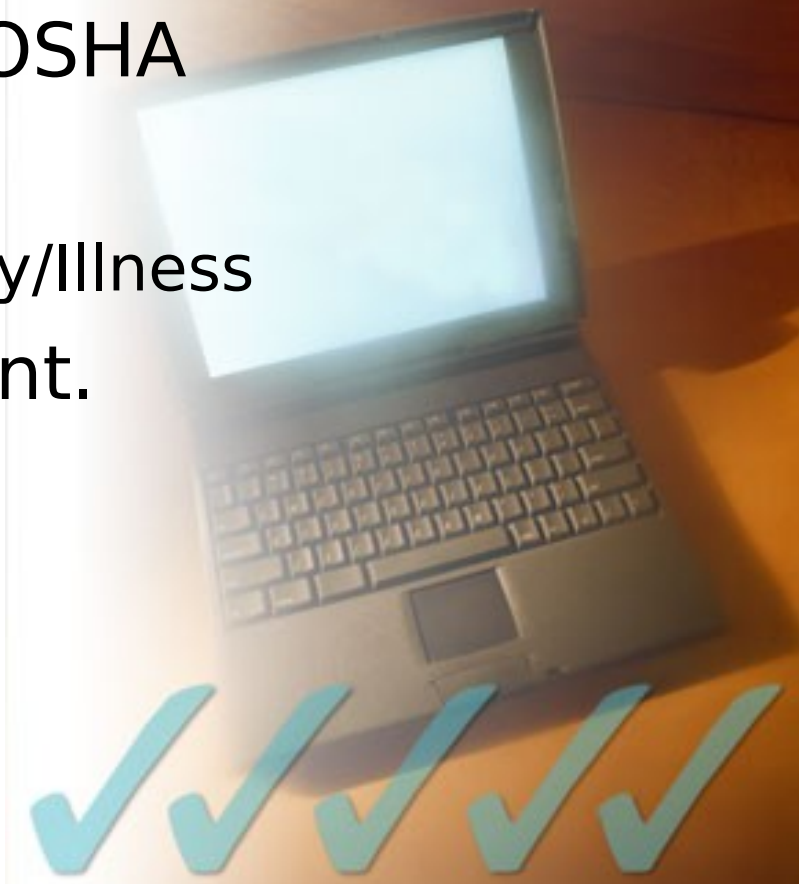
OSHA Recordkeeping History

- 1971 – Recordkeeping required
- January 19, 2001 – New rule published
- January 1, 2002 – Effective date
- January 1, 2005 – Federal Agencies required to maintain OSHA 300 Logs and report to Bureau of Labor & Statistics (BLS).



Importance of Recordkeeping

- Trend Analysis for the site
- Outreach/intervention by OSHA
- Assists BLS
  - Generates statistics on Injury/Illness
- VPP application requirement.



Identifying Work Related Incidents

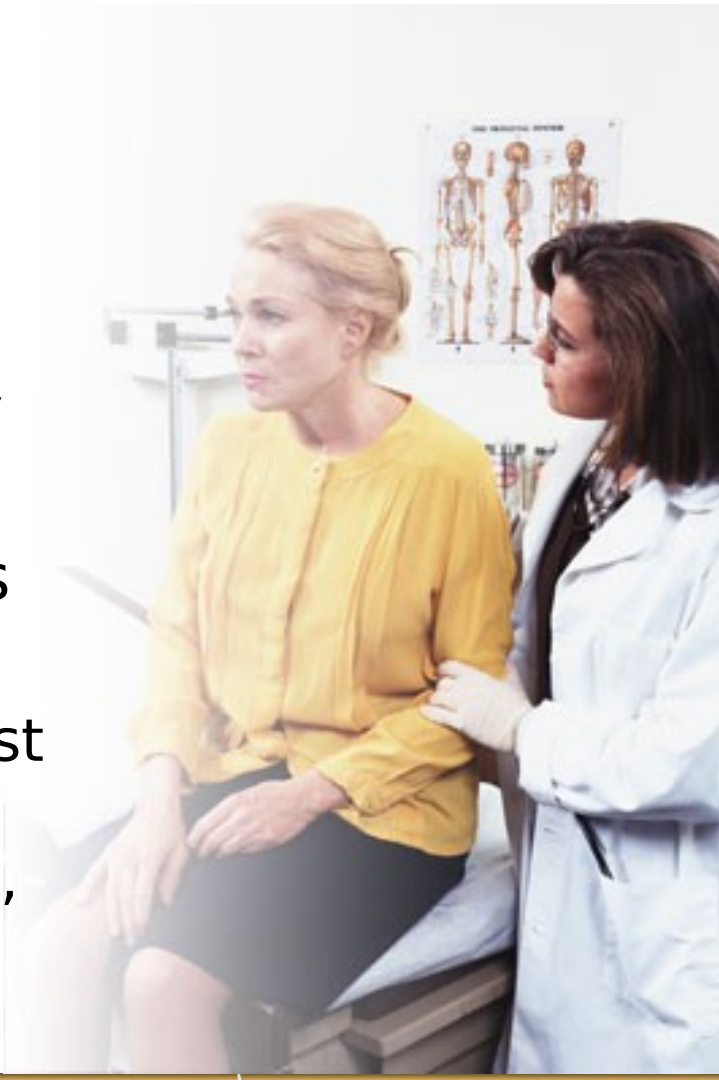
- Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the workplace
- If an event or exposure in the work environment significantly aggravates a pre-existing condition, it is also considered work-related
- OSHA Recordkeeping and Workers' Compensation rules are **NOT** identical.

Recordable Incidents

- Recordable work-related injuries and illnesses are:
  - Death
  - Days away from work
  - Restricted work or transfer to another job
  - Medical treatment beyond first aid
  - Loss of consciousness
  - Standard Threshold Shift in hearing in one or both ears
  - Musculoskeletal disorders that require medical treatment
  - Diagnosis of a significant injury/illness by a physician or other licensed health care professional.

Non-Recordable Incidents

- The following are not considered recordable:
  - Visits to the doctor or health care professional for observation or counseling only
  - Diagnostic procedures
  - Colds, flu, and blood donations
  - First aid:
    - OSHA published an inclusive list of first aid measures
    - If a procedure is not on the list, it is considered “medical treatment.”



Leadership Role

Leadership Role

- Establish local process/procedure for recording TCIR and DART rates
- Capture historical rate information for last three years – VPP requirement.
- Facilitate cooperative reporting/information sharing between Safety and Medical/Health staff
  - OSHA reporting requirements do not conflict with Health Insurance Portability and Accountability Act (HIPPA) – Mediate conflicts.

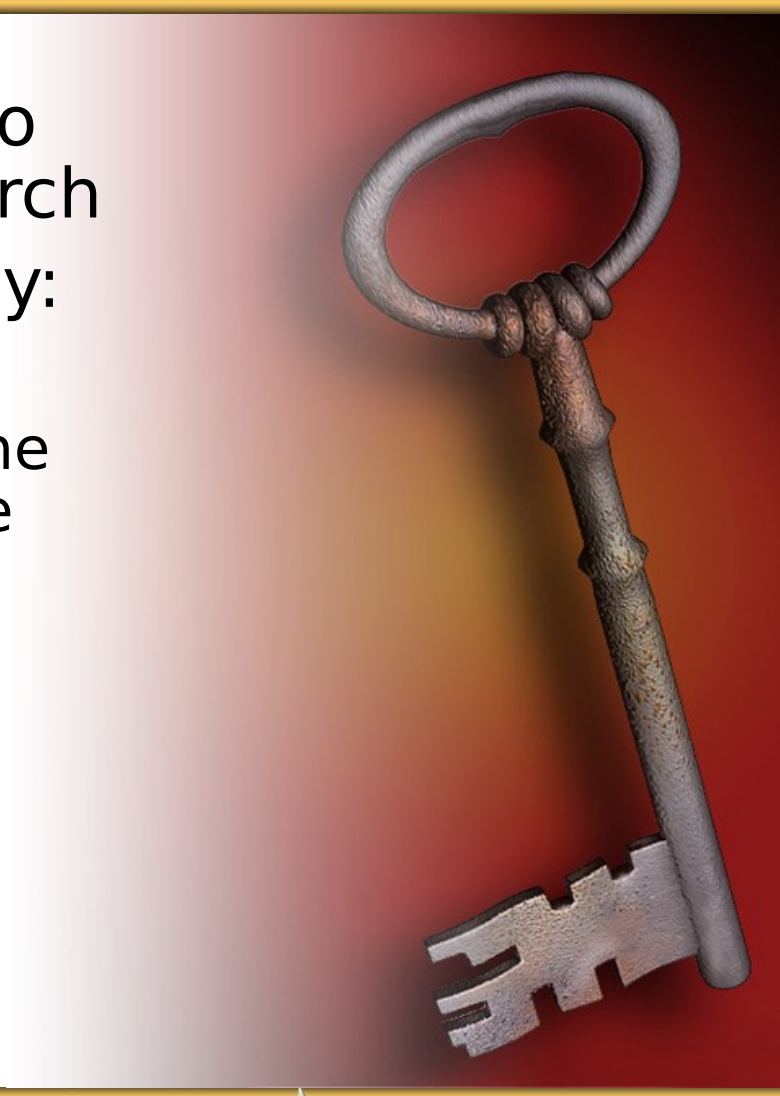
NAICS Determination

VPP Requirements for NAICS Codes

- There are two main VPP application requirements in regards to the NAICS Code:
  - A VPP application requires a NAICS Code identification
    - The most recent 3-year combined installation TCIR and DART rates must be **below at least 1 of the 3** most recent years published BLS rates for the NAICS Code selected by the installation.

Primary Activity

- “Primary Activity” is the key to performing a NAICS Code search
- Identify the primary activity by:
  - Reviewing the installation’s primary mission, i.e., the reason the installation was built or the service provided to tenant activity
  - Determining the activity that utilizes the most employees
  - Determining the activity that generates the most revenue.



NAICS Code Search Example

336411 Aircraft Manufacturing

This U.S. industry comprises establishments primarily engaged in one or more of the following: (1) manufacturing or assembling complete aircraft; (2) developing and making aircraft prototypes; (3) aircraft conversion (i.e., major modifications to systems); and (4) complete aircraft overhaul and rebuilding (i.e., periodic restoration of aircraft to original design specifications).

Cross-References.

- Establishments primarily engaged in manufacturing guided missiles and space vehicles are classified in U.S. Industry 336414, Guided Missile and Space Vehicle Manufacturing;
- Establishments primarily engaged in the repair of aircraft (except overhauling, conversion, and rebuilding) are classified in Industry 488190, Other Support Activities for Air Transportation; and
- Research and development establishments primarily engaged in aircraft R&D (except prototype production) are classified in Industry 541710, Research and Development in the Physical, Engineering, and Life Sciences.

Go to: No change 1997 to 2002 | 2002 NAICS to 1987 SIC | 1997 Economic Census | Bridge Between 1997 NAICS and SIC

2002 NAICS	1997 NAICS	1987 SIC	Corresponding Index Entries
336411	336411	3721	Aircraft conversions (i.e., major modifications to system)
336411	336411	3721	Aircraft manufacturing
336411	336411	3721	Aircraft overhauling
336411	336411	3721	Aircraft rebuilding (i.e., restoration to original design specifications)
336411	336411	3721	Autogiros manufacturing
336411	336411	3721	Blimps (i.e., aircraft) manufacturing

Example Comparison of TCIR and DART

		Aircraft Manufacturing			
		NAICS 336411/ SIC 3721			
	Site Rate	**Site Rate**	**BLS Data**	**BLS Rate**	**BLS Rate**
Year	**TCIR**	**DART**	**Year**	**TCIR**	**DART**
2004	5.5	2.4	2003	5.6	3.1
2005	5.1	2.9	2004	4.8	2.7
2006	4.3	2.2	2005	4.4	2.6
3-Year Combined	**4.7**	**2.9**			

Discussions with OSHA VPP Office

- Installations should initiate discussions concerning the appropriate NAICS Code with their Regional or Area OSHA VPP office early in the VPP preparation process.

Leadership Role

Leadership Role

- Facilitate the identification of proper NAICS
- Monitor the NAICS selection process
- Coordinate with upper echelon to ensure consistent NAICS selection.

Summary

In this section you learned about:

- The history of OSHA Recordkeeping
- Recordkeeping goals
- Recordable and non-recordable incidents
- The role of Leadership in Recordkeeping
- Requirements for NAICS code determination
- TCIR and DART case rate
- The role of Leadership in NAICS.

Questions?